

FILED

MAR 18 2025

U.S. DISTRICT COURT- WVND
MARTINSBURG, WV 25401

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,

v.

MARCUS DE'ANGELO BROWN,

Defendant.

Criminal No. 3:25-CR-7

Violations: 18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(8)
18 U.S.C. § 933(a)(2)

SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Trafficking in Firearms)

On or about August 16, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **MARCUS DE'ANGELO BROWN** did receive from another person, in and otherwise affecting interstate and foreign commerce, a firearm, to wit: a Smith & Wesson, Model M&P 57, 5.7 caliber pistol bearing serial number EFC4008, knowing and having reasonable cause to believe that such receipt would constitute a felony, and did attempt and conspire to do so, in violation of Title 18, United States Code, Section 933(a)(2).

COUNT TWO

(Unlawful Possession of Firearm)

On or about August 16, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **MARCUS DE'ANGELO BROWN** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, the felony offenses of "Sale for Profit a Controlled Drug (F)" in violation of Virginia Code Section 18.2-248 on February 24, 2023 in case number FE-2021-672 in the Circuit Court of Fairfax County, Virginia; Carry Pistol Outside Home/Business (Pistol), Unlawful Possession of a Firearm, Possession of Unregistered Firearm/Unlawful Possession of a Firearm or Destructive Device, Unlawful Possession Ammunition in case number 2012 CF2 -16435 in the Superior Court of the District of Columbia; and possession with intent to distribute cocaine in violation of 33-541(a)-(b) in the Superior Court of the District of Columbia in case number 07 CF2 8763; did knowingly possess a Smith & Wesson, Model M&P 57, 5.7 caliber pistol bearing serial number EFC4008, said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

FORFEITURE ALLEGATION

Gun Control Act

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1) and 934, the government will seek the forfeiture of any firearm and any ammunition involved in and used in any knowing violation of Title 18, United States Code, Sections 922(g)(1) and 933 including the following a Smith & Wesson, Model M&P 57, 5.7 caliber pistol bearing serial number EFC4008.

A True Bill,

/s/
Grand Jury Foreperson

/s/
RANDOLPH J. BERNARD
Acting United States Attorney

Lara K. Ombs-Botteicher
Morgan C. McKee
Assistant United States Attorneys